

EXHIBIT A

STATEMENT OF WORK

The following Statement of Work sets forth tasks to be performed by Iron Mountain (the Contractor) and performance standards that apply to all MCI locations utilizing Contractor for offsite records storage and management, unless otherwise indicated.

OVERVIEW

Contractor shall provide all labor, equipment and personnel to provide all records management services to MCI including, but not limited to client interface services, records storage, accession, retrieval, refile and destruction services; special projects, documentation / certification of destruction, comprehensive and accurate data entry and support services; and accurate invoicing and reporting.

DEFINITIONS

Records & Information Management ("RIM"): MCI's RIM department is responsible for the overall management of MCI's records management program. All services shall be reviewed, coordinated and approved by this department.

Work: Includes all records management services including but not limited to data support services, records storage, accession, retrieval, refile, destruction, customer education and support services necessary to support all requirements of this SOW.

Carton: Used interchangeably with box and container. Refers to the packaging used to store records.

GENERAL REQUIREMENTS

The following are general requirements for records management services to be provided by the Contractor.

- A. The Contractor will ensure the security of MCI records in accordance with Articles 6, 7, 8 and 11 of this Agreement.
- B. The Contractor will assign to the MCI account, at a minimum: A National Account Service Manager, and at the district level, a District Manager and customer support personnel.
- C. All records storage, accession, retrieval, refile and destruction services shall be in accordance with MCI's Records Retention Schedule ("RRS") which is attached hereto and made a part of this Agreement (see Attachment A).
- D. The Contractor shall not acknowledge nor use, under any circumstances, Record Classification Codes or Record Series (RS) numbers other than those contained in MCI's Record Retention Schedule (RRS). If an RS number is in question RIM should be contacted.

MCIWC031843

Records Management Program – Policies & Procedures

- E. The Contractor shall only use electronic mail to communicate with MCI sites for the purpose of receiving and acknowledging service requests, unless other communication methods have been approved by RIM in writing.
- F. All communications with MCI end-users will be 'copied' (cc) to RIM.
- G. The Contractor's customer support personnel must be knowledgeable about the MCI's account. Support personnel will answer questions from local users, receive and initiate orders, communicate with MCI users and make every effort to answer billing, service and operational issues within 24 hours. A Program Manager will be assigned to the MCI account and serve as the primary source of communication and information between RIM, MCI end-users and Iron Mountain support personnel. The Program Manager will respond to MCI issues within 24 hours, if only to acknowledge the issue and discuss necessary follow-on work.
- H. Only the MCI requestor's name will be used in connection with the service request unless otherwise stated in the special instructions. Default names will not be used.
- I. The Contractor will maintain an in-house box tracking system which captures the following data:

<u>Field</u>	<u>Field Type</u>	<u>Characters</u>
MCI department	alpha numeric	8
Carton Barcode Number	alpha numeric	vendor specific
Reference Number	alpha numeric	
Record series #	alpha numeric	5
From date	date	8
Thru date	date	8
Contents Description	alpha numeric	55
Retention Hold Code	alpha numeric	3
Destruction Review Date	date	8
Service Order Number	alpha numeric	vendor specific
(SO cartons were received on)		
Order Requestor	alpha	20
(MCI submitter)		
Service Date	date	8
(date cartons were received)		

The Contractor will be responsible only for the information as provided by MCI

- J. MCI's Records Retention Schedule must be incorporated into the Contractor's database. Destruction dates must be calculated using the RRS data and thru dates.
- K. The Contractor's personnel should instruct MCI users to contact RIM if they need guidance on utilizing MCI's Record Management Program.
- L. The MCI Box Inventory Form will be utilized exclusively (see Attachment H). The contractor will direct MCI end-users to RIM for a supply of the Form.

Records Management Program – Policies & Procedures

- M. Inventory forms must accompany all new inventory/records sent to storage. Orders with no accompanying inventory forms will not be accepted for pick up. MCI will review the Inventory Forms prior to placing the pick-up order.

All information will be entered in to the Contractor's system as received on the Inventory Form provided by MCI, to include the Retention Code if completed. (For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)

- N. File-level indexing. All cartons that have been file-level indexed will be accompanied by the MCI Carton / File-Level Inventory Form (see Attachment I) or listing in an acceptable electronic format. A hardcopy of the Inventory Form or listing will be contained in the carton and a duplicate copy will be transmitted to the Contractor electronically. Prior to receipt by the Contractor, each carton will contain a carton barcode number and each file will have assigned a Customer File ID number and a File Description.

Upon receipt, the Contractor must verify the contents of each carton against the accompanying inventory form or listing. Any discrepancies will be referred back to the submitter, copying RIM.

- O. Only RIM personnel, and MCI personnel given authorization by RIM, can permanently withdrawal MCI records. The Contractor's Chicago and Kansas City districts will be provided an authorization list identifying MCI personnel authorized to permanently withdrawal. In all other circumstances, RIM will submit permanent withdrawal orders to the Contractor's Program Manager for routing to the pertinent Contractor district for processing. All permanent withdrawal orders must be received by the Contractor in writing.
- P. The Contractor will provide MCI with an electronic version of their inventory data contained within Contractor's inventory system in an agreed upon format and frequency.
- Q. The Contractor shall exercise disaster recovery procedures as described in Attachment D, of this Agreement.

REPORTING

MCI's requirements with regard to reporting and invoicing for the Contractor's account are as follows:

- A. The following reports will be delivered to MCI as outlined below, in mutually agreed upon formats:
- 1) New box storage activity report (monthly). Due the 15th of each month, reporting on the previous month. Contains: All new storage for that month. This report will be sorted by MCI department.
 - 2) Retrieval / Outcard Report (quarterly). Due April 15th, July 15th, October 15th, and January 15th. Contains: This report lists all retrievals outcarded for more than one day. This report will be sorted by the retriever's name.

Records Management Program – Policies & Procedures

- 3) Inventory Report (annually). Due March 31st or after the annual destruction project is completed. Contains: Full inventory listing. This report will be sorted by Record Classification Code.
- 4) Candidates for destruction (annually). Due November 15th. Contains: All cartons eligible for destruction as of the end of that calendar year, in accordance with MCI's Record Retention Schedule. This report will be sorted by Record Classification Code.
- 5) Retention Hold Code (annually). Due June 30th. Contains: Lists all cartons assigned a Retention Hold Code. This report will be sorted by the Retention Hold Code.

Items 1, 3, 4 & 5 above will contain the information/fields listed under Item I, herein, "General Requirements".

Item 2, the Retrieval / Outcard Report, will contain MCI department, carton barcode number, carton description, Record Classification Number, name of the MCI requestor, the date of retrieval and the service order number.

B. All reporting and invoicing will be provided to MCI using the exact same cut-off date. That cut off date will be the last business day of the month.

RETRIEVAL / REFILE / NEW STORAGE

MCI checks the departments of all requestors versus the information related to the individual boxes which the requestor has asked to pull; this is to help ensure sensitive material, such as HR records, are kept private. The Contractor shall provide retrieval/refile and storage services at locations as designated and agreed to by MCI and the Contractor. These services include the following specific requirements:

- A. Types of service:
 - "Regular": Retrieval / pickup the next service day.
 - "Same day": Request is received before 10am; delivery will be made that service day. This type of service must be specified by the requestor (otherwise it is a "regular" service request).
 - "Rush": Service provided within two (2) hours of the request (but within regular business hours). This type of service must be specified by the requestor in the submitted service request. The requestor must follow the service request by a telephone call to the Contractor informing them of the submission of the rush order.
- B. If certain Contractor facilities/areas are unable to provide two (2) hour rush service, these facilities/areas must be identified to RIM by the Contractor. With RIM's concurrence, only "Regular" and "Same day" service will be provided in those areas.
- C. Services should be performed throughout the week (Monday-Friday).
- D. Retrieval, refile and new storage requests received by 4:00pm will be serviced on the next scheduled run. Requests received on a Friday will be delivered / picked up on the following Monday.

Records Management Program – Policies & Procedures

- E. Under no circumstances will the Contractor perform nor charge MCI for Rush or After Hour pickups.
- F. Respond to service requests by electronic mail within four (4) hours of receiving the request. Electronic mail is the only acceptable method to be used for service requests. Electronic mail confirmations will be sent for each service request, copying all addressees. The confirmations will contain the service order number and the delivery date.
- G. New storage and refills will be shelved, data entered with information received, and fully processed within 72 hours of receipt.
- H. The Contractor will not retrieve MCI records for any reason other than responding to MCI service requests without written approval from RIM.
- I. If there is to be a delay in delivering records under a service request due to locating / retrieving the requested records, the Contractor will notify the requestor, by phone, prior to delivery of the order. If the requested service will be delayed beyond the normal service schedule (i.e., beyond the next day scheduled delivery), a follow-up email will be sent to the requestor with a copy ('cc') to RIM. Notifications should provide the reason for the delay and expected delivery reschedule. Under no circumstances should notification occur only at the point of delivery.
- J. The Contractor will obtain the signature of the individual receiving MCI records on a delivery.
- K. The Contractor will not, under any circumstances, deliver MCI records to a MCI mailroom, loading dock or similar facility unless a specific exception is authorized in writing by RIM and agreed upon by Contractor.

CONSOLIDATED DATABASE

The consolidated database, maintained by MCI, refers to the merged descriptive and retention information for *all* MCI records stored offsite.

- A. The Contractor will provide consolidated datastrips to MCI in a mutually agreed upon format.
- B. Datastrips, will include all descriptive and retention information (listed in item I, herein, under General Requirements) for all of MCI's boxes in Contractors' system.

THE CONTRACTOR'S DATABASE

The Contractor shall use their computerized inventory control system to manage MCI's records.

- A. Data entry will be performed with 99% accuracy.

An error is defined as: Any miss-keyed data and/or Record Series Number, any transposition, missing digits. Reasonable occurrences of missing punctuation,

Records Management Program – Policies & Procedures

misspellings, inaccurate abbreviations etc. will not constitute errors. (For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)

- B. New storage and refills will be shelved, data entered with information received, and fully processed within 72 hours of receipt.
- C. The Contractor's inventory control system will contain (at a minimum) the information listed under item I (herein), General Requirements.
- D. The Contractor will receive and process into their data system any updates to the database submitted by MCI. The Contractor will ensure that these changes have been incorporated into the data provided to MCI via monthly reports.
- E. The Contractor's system will automatically calculate destruction review dates for all new storage, based on retention periods from MCI's Record Retention Schedule, which will have been loaded into their system.
- F. MCI will provide the Contractor with a diskette containing any changes to MCI's Record Retention Schedule, as soon as the change is adopted.

DESTRUCTION

Destruction of MCI records will be in accordance with industry standards. To include, or in addition to:

- A. Contractor shall not destroy or purge any MCI boxes or information without written approval from RIM. Only RIM has the authority to approve destruction of boxes or information contained in Contractor's warehouse.
- B. The destruction sequence to include the following:
 - 1. Produce a Destruction Review Report listing all containers eligible for disposal. This report must be sorted by Record Classification Code. Submit to MCI by November 15.
 - 2. Upon receipt of the Destruction Review report back from MCI, any changes by MCI are entered and returned to MCI for final approval. MCI will return the final report with no remaining corrections to Iron Mountain to initiate the destruction.
 - 3. Report Unavailable Items to MCI. After identifying authorized containers from the Destruction Review report, generate a listing of containers that are unavailable for disposal because they are out on retrieval at the customer. MCI will use this report to research the retrieval and contact the MCI user for status.
 - 4. Verify that the containers pulled are those authorized on the Destruction Order (preferably utilizing bar code scanning).
 - 5. The Contractor will provide MCI a Destruction Certificate report after the completion of destruction. This report, signed by the Contractor, will list all the containers destroyed. It will include complete descriptive data for each container.

**MCI PROCEDURES
FOR
VENDOR OFF-SITE RECORDS MANAGEMENT AND STORAGE**

GENERAL REQUIREMENT

The following are general requirements for records management services to be provided by the Contractor.

- A. The Contractor will assign to the MCI account, at a minimum: An Account Manager and appropriate Customer Support personnel in each district.
- B. All records storage, accession, retrieval, refile and destruction services shall be in accordance with MCI's Records Retention Schedule ("RRS") which is attached hereto.
- C. The Contractor shall only use electronic mail to communicate with MCI sites for the purpose of receiving and acknowledging service requests, unless other communication methods have been approved by RIM in writing.
- D. All communications with MCI end-users, no matter the subject matter, will be 'copied' (cc) to RIM.
- E. The Contractor's customer support personnel must be knowledgeable about and cross-trained on all aspects of the MCI's account. Support personnel must be able to answer questions from local users, receive and initiate orders, communicate with MCI users and must make every effort to answer billing, service and operational issues within 24 hours.
- F. The Contractor will maintain an in-house box tracking system which captures the following data:

Records Management Program – Policies & Procedures

<u>Field</u>	<u>Field Type</u>	<u>Characters</u>
MCI department	alpha numeric	8
Carton Barcode Number	alpha numeric	vendor specific
Reference Number	alpha numeric	
Record series #	alpha numeric	5
From date	date	8
Thru date	date	8
Contents Description	alpha numeric	55
Retention Hold Code	alpha numeric	3
Destruction Review Date	date	8
Service Order Number (SO cartons were received on)	alpha numeric	vendor specific
Order Requestor (MCI submitter)	alpha	20
Service Date (date cartons were received)	date	8

- G. MCI's Records Retention Schedule must be incorporated into the Contractor's data system. Destruction dates must be calculated using the RRS data and thru dates.
- H. The MCI Box Inventory Form will be utilized exclusively.
- I. Inventory forms must accompany all cartons sent to storage. Cartons without accompanying inventory forms will not be accepted for picked up. All fields must be entered in to the Contractor's system, to include the Retention Code if completed. (For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)
- J. File-level indexing. All cartons that have been file-level indexed will be accompanied by the MCI Carton / File-Level Inventory Form (see Attachment III for copy). This form must be completed in full, to include data for all files contained in the carton.

Prior to receipt by the contractor, each carton will contain a carton barcode number, and each file will have assigned a six-digit file identification number. The carton barcode number and the file identification numbers will be included in the inventory data on the File-Level Inventory Form and will be entered in to the Contractor's system.

Upon receipt, the Contractor must verify the contents of each carton against the accompanying inventory form.

- K. Only RIM personnel, or MCI personnel given authorization by RIM, can authorize the permanent withdrawal of any MCI records. A list of authorized personnel will be given to Contractor. A request for permanent withdrawal, from authorized personnel, must be received by the Contractor in writing.

MCIWC031850

Records Management Program – Policies & Procedures

- L. The Contractor will provide MCI with an electronic version of their inventory data contained within Contractor's inventory system in an agreed upon format.
- M. The Contractor shall exercise disaster recovery procedures as described in Exhibit B, of this contract.

REPORTING

MCI's requirements with regard to reporting and invoicing for the Contractor's account are as follows:

- A. The following reports will be delivered to MCI as outlined below, in mutually agreed upon formats:
 - 1) New box storage activity report (monthly). Due the 15th of each month, reporting on the previous month. Contains: All new storage for that month. This report will be sorted by MCI department.
 - 2) Retrieval / Outcard Report (quarterly). Due April 15th, July 15th, October 15th, and January 15th. Contains: This report lists all retrievals outcarded for more than one day. This report will be sorted by the retriever's name.
 - 3) Inventory Report (annually). Due March 31st or after the annual destruction project is completed. Contains: Full inventory listing. This report will be sorted by Record Classification Code.
 - 4) Candidates for destruction (annually). Due November 15th. Contains: All cartons eligible for destruction as of the end of that calendar year, in accordance with MCI's Record Retention Schedule. This report will be sorted by Record Classification Code.
 - 5) Retention Hold Code (annually). Due June 30th. Contains: Lists all cartons assigned a Retention Hold Code. This report will be sorted by the Retention Hold Code.

Items 1, 3, 4 & 5 above will contain the information/fields listed under item I, herein, "General Requirements".

Item 2, the Retrieval / Outcard Report, will contain MCI department, carton barcode number, carton description, Record Classification Number, name of the MCI requestor, the date of retrieval and the service order number.

- B. All reporting and invoicing will be provided to MCI using the exact same cut-off date. That cut off date will be the last business of the month.

RETRIEVAL / REFILE / NEW STORAGE

The Contractor shall provide retrieval/refile and storage services at locations as designated and agreed to by MCI and the Contractor. These services include the following specific requirements:

MCIWC031851

Records Management Program – Policies & Procedures

- A. Types of service:
- “Regular”: Retrieval / pickup the next service day.
- “Same day”: Request is received before 10am; delivery will be made that service day. This type of service must be specified by the requestor (otherwise it is a “regular” service request).
- “Rush”: Service provided within two (2) hours of the request (but within regular business hours). This type of service must be specified by the requestor.
- B. Deliveries or pick-ups should be performed throughout the week (Monday-Friday). If a user requires delivery after hours, weekends or 2-hour rush retrieval /delivery, the Contractor will inform the user that their department will be charged for the delivery.
- C. Retrieval, refile and new storage requests received by 4:00pm will be delivered / picked up on the next scheduled run. Requests received on a Friday will be delivered / picked up on the following Monday.
- D. Under no circumstances will the Contractor perform nor charge MCI for Rush or After Hour *pickups*.
- E. Respond to service requests by electronic mail within two (4) hours of receiving the message. Electronic mail is the only acceptable method that should be used for service requests. Electronic mail confirmations will be sent to each service request, copying all addressees. The confirmations will include the number of cartons/files, the service order number and delivery date.
- F. New storage and refills will be shelved, data entered, and fully processed within 72 hours of receipt.
- G. The Contractor will not retrieve MCI records for any reason other than responding to MCI service requests.
- H. If there is to be a delay in delivering records under a service request due to locating / retrieving the requested records, the Contractor will notify the requestor immediately by email, with a copy ('cc') to RIM. Notification should provide the reason for the delay and expected delivery reschedule. Under no circumstances should notification occur only at the point of delivery.
- I. The Contractor will obtain the signature of the individual receiving MCI records on a delivery.

CONSOLIDATED DATABASE

The consolidated database, maintained by MCI, refers to the merged descriptive and retention information for *all* MCI records stored offsite.

- A. The Contractor will provide consolidated datastrips to MCI in a mutually agreed upon format.

Records Management Program – Policies & Procedures

- B. Datastrips, will include all descriptive and retention information (listed in item I, herein, under General Requirements) for all of MCI's boxes in Contractors' system.

THE CONTRACTOR'S DATABASE

The Contractor shall use their computerized inventory control system to manage MCI's records.

- A. Data entry will be performed with 99% accuracy. Redundant data entry will be used for barcode numbering.

An error is defined as:

Any incorrect data and/or Record Series Number, any transposition, missing digits, or incorrect descriptive information such that either the number is inaccurate or unusable for its intended purpose, or that the description is inaccurate or unusable for its intended purpose. Reasonable occurrences of missing punctuation, misspellings, inaccurate abbreviations etc. will not constitute errors.

(For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)

- B. New storage and refills will be shelved, data entered, and fully processed within 72 hours of receipt.
- C. The Contractor's inventory control system will contain (at a minimum) the information listed under item I (herein), General Requirements.
- D. The Contractor will receive and process into their data system any updates to the database submitted by MCI. The Contractor will ensure that these changes have been incorporated into the data provided to MCI via monthly reports.
- E. The Contractor's system will automatically calculate destruction review dates for all new storage, based on retention periods from MCI's Record Retention Schedule, which will have been loaded into their system. If this is not possible, the Contractor will calculate the destruction review dates based on retention periods from MCI's RRS and enter the date into their system.
- F. MCI will provide the Contractor with a diskette containing any changes to MCI's Record Retention Schedule, as soon as the change is adopted.

DESTRUCTION

Destruction of MCI records will be in accordance with industry standards. To include, or in addition to:

- A. Contractor shall not destroy or purge any MCI boxes or information without written approval from RIM. Only RIM has the authority to approve destruction of boxes or information contained in Contractor's warehouse.
- B. The destruction sequence to include the following:

MCIWC031853

Records Management Program – Policies & Procedures

1. Produce a Destruction Review Report listing all containers eligible for disposal. This report must be sorted by Record Classification Code. The report should provide a section in which MCI can indicate, for each container, instructions not to destroy containers or make changes to Disposal Dates or Retention Codes. Submit to MCI by November 15.
2. Upon receipt of the Destruction Review report back from MCI, any changes by MCI are entered and then reviewed by a supervisor.
3. Report Unavailable Items to MCI. After identifying authorized containers from the Destruction Review report, generate a listing of containers that are unavailable for disposal because they are out on retrieval at the customer. MCI will use this report to research the retrieval and contact the MCI user for status.
4. Verify that the containers pulled are those authorized on the Destruction Order (preferably utilizing bar code scanning).
5. The Contractor will ensure the security of MCI records during transport and actual destruction.
6. The Contractor will provide MCI a Destruction Certificate report after the completion of destruction. This report, signed by the Contractor, will list all the containers destroyed. It will include complete descriptive data for each container and will be accompanied by a description of where and when the destruction occurred and the method of destruction.

APPENDIX F

Box Inventory Form

File-Level Inventory Form

Fax Order Form

2012 RELEASE UNDER E.O. 14176

APPENDIX G

Inventory Project Documents

Inventory Project Requirements and Expectations

1. A written estimate that outlines the full scope of the project and its costs is required. The estimate should include:
 - estimated start and completion date
 - labor (number of people, level (supervisor, etc.) and hours). Iron Mountain (IM) will identify if labor pool will be non-IM personnel, such as contractors or temporaries.
 - actual number of cartons
 - **condition of all cartons**, along with the number that requires a new carton
 - number of cartons that need to be inventoried, broken down by type of inventory (date range only, description only or both)
 - number and cost of data entry
2. At least one supervisor, who is an IM employee, will be responsible for any inventory project. IM will provide the name of the individual responsible for the inventory project and a phone number where that individual may be reached during business hours.
3. Project cost overruns should be discussed with MCI's Records & Information Management (RIM), prior to the costs being incurred. RIM, with input from IM, will evaluate the costs and the justification. RIM, if the costs are approved, will provide written approval to IM. It is RIM's expectation that such situations will be infrequent.
4. IM will submit to RIM, via e-mail, a weekly Inventory Project Status Reports by Monday of the following week. The status report should indicate, if applicable:
 - a. The number of cartons inventoried;
 - b. The number of cartons data entered;
 - c. The number of cartons reboxed;
 - d. The number of cartons shipped to RIM;
 - e. If the project is on target for the indicated completion date;
 - f. Any problems that may have occurred; and
 - g. Any changes in IM personnel regarding the project.
5. Cartons that are retrieved within IM's warehouse, for this inventory project, will be outcarded to Chicha Barnes. IM will be able to identify, at all times, the location of all cartons retrieved for an inventory project.
6. RIM will supply the Inventory Form to be used for each inventory project; the form is titled "MCI Inventory Form – for Projects". IM will be responsible for copying the form to be used throughout the project.
7. IM will review the outside of each carton for data information. However, IM will not solely rely on any information written on the outside of cartons, especially if

Records Management Program – Policies & Procedures

the information is not available, logical or descriptive. Such terms as: miscellaneous files, general files, desk files, old files, or office files are unacceptable descriptions. If the information on the side of each carton is not clear or has unacceptable descriptions, IM will review the contents of the carton for the information. If IM still has difficulty with obtaining carton data, IM will call RIM in a weekly phone call with cartons in front of them so they can review what they see to the RIM contact.

8. IM will capture date range (from and/or thru dates) for all cartons missing this information. The From date is the oldest date, and the Thru date is the newest date. If the dates are not clearly written on the outside of the carton, IM will obtain the date range from the record contents inside the carton. If there is no clear "day" but month and year can be supplied, the from "day" will be the first day of a month and the thru "day" will be the last day of the month. If there is no clear day or month, but a year can be supplied, IM will span the entire year for the date range (i.e., 01/01/99 - 12/31/99).
9. IM will capture descriptions for all cartons that are missing this information. In providing descriptions, IM will review the contents of the carton to obtain descriptive information of its contents. If there is any question as to what the description should be for any particular carton, IM will contact RIM on a weekly basis with the cartons in front of them so they can review what they see to the RIM contact.

Examples are as follows:

- a. If a carton contains multiple types of records, and there is no one clear description for the carton contents, IM will call RIM for instructions.
 - b. If IM determines that the contents of a carton are reports, IM may use the report name as a description, if the carton contains the same reports.
 - c. If IM determines the contents of a carton are canceled checks, IM may use "Canceled Checks" as a description; however, IM must also capture the bank name (ex., Canceled Checks, Bank of America).
 - d. If IM comes across cartons that contain postcard looking records, and it appears to be information regarding a customer requesting MCI services, IM should use the description of "Letters of Authorization" along with the program name that is on the front of the postcard.
 - e. If IM comes across cartons containing files with just names on them, they will need to open the file to determine if they are payroll records, personnel records or customer records.
 - f. If IM comes across cartons that contain various types of software manuals, the description should be "Software Application Manuals". If the cartons contain other types of system records, IM should be as descriptive as possible.
10. If IM comes across cartons that contain electronic media such as tapes, diskettes, microfiche or microfilm, IM will visually inspect the media to determine if it looks to be harmed in any way from being stored in the regular warehouse (i.e., rodent damage, water damage, heat damage which visibly shows melting, etc.). If

Records Management Program – Policies & Procedures

- the media appears to be harmed, IM will inform RIM in their weekly status report along with barcode numbers and type of visible damage and descriptive data, if any. If the media appears to be fine, IM will put the carton of electronic media into climate control storage.
11. If IM comes across any cartons that contain office supplies, equipment, personal items, such as pictures, coffee mugs, or other non-record type cartons, IM will inform RIM in their weekly status report. RIM will follow-up with a message on what the disposition should be on the carton(s).
 12. IM will fax completed inventory forms to RIM, on a daily basis, for review; RIM's fax number is: 703-886-0807. RIM will review the forms and assign record class codes. Any inventory form that is incomplete will NOT be assigned record class codes and will note the deficient area. Inventory forms will be reviewed within 72 hours of receipt by RIM and faxed back to IM. Only those forms with record class codes and stamped "Approved" by RIM should be entered to IM's system. Data entry will occur for cartons inventoried as the project progresses. All data for cartons that have had their inventory forms approved by RIM will be entered into IM's system within five business days of approval.
 13. During RIM's review of the inventory form, if there is any question as to the validity of a description, RIM will contact IM's project supervisor. It will be IM's responsibility to go back and review the carton or inventory of its contents for a better description. Should IM experience difficulty in securing a description or other required information, RIM should be informed in the weekly status report.
 14. During the inventory project, it is understood that IM may have to use new cartons for boxes that are deteriorating. IM will inform RIM in their weekly status report the number cartons that needed new boxes, if any. IM will carryover the barcode number from the old carton to the new one.
 15. The inventory project will not be considered completed or finished until all data entry is completed; this includes the entry of record class codes for each carton, destruct review dates generated, and a full report mailed and received by RIM.

MCI BOX INVENTORY PROJECT ESTIMATE REQUEST

(For Cartons Currently in Iron Mountain Warehouse)

Date: _____ **Expected IM Response Date:** _____

Iron Mountain District: _____ **Account #:** _____

Request By: _____ **Email:** _____

Telephone: _____ **Fax:** _____

Address: _____

PURPOSE OF PROJECT: The purpose of this project is to capture all missing data information and enter all identified data for cartons currently located in Iron Mountain's warehouse, as indicated on the attached inventory report, by MCI's Records & Information Management.

Carton Inventory Request:

Number of Cartons that Need Dates Only: _____

Number of Cartons that Need Description Only: _____

Number of Cartons that Need Both Dates and Description: _____

Instructions:

1. The attached listing shows data entries for either date range, record class or both. Please enter these into your database system along with any typo changes.
2. Per the attached inventory report, the cartons that need date range inventory only will have a highlight in the date range field. Cartons that need description inventory only will have the description area highlighted. Cartons that need a complete inventory for both date range and description will have the barcode number highlighted.
3. MCI expects that Iron Mountain will fulfill the scope and our requirements of this project as outlined in the attached Inventory Project Requirements and Expectations.

Records Management Program – Policies & Procedures

Iron Mountain Estimate:

Project Start Date: _____ **Project End Date:**

Number of Hours: _____ **Number of People:**

Type of Personnel to be Used (temporaries, contractors or permanent):

Name of Project Supervisor:

Phone Number of Project Supervisor:

E-mail of Project Supervisor:

Location where Inventory Project will be performed:

Fax Number where Approved Inventory Forms are to be sent:

Cost Breakdown:

Retrieval:

Refile:

Supplies:

Labor (explain):

Other (explain):

Total Cost: _____

Records Management Program – Policies & Procedures

Estimate By:

(print name)

Phone: _____ **Fax:**

Address:

Email:

Iron Mountain Signature & Date:

MCI Approval By:

(print name)

MCI Signature & Date:

INVENTORY PROJECT PLAN FOR NEW JERSEY

OBJECTIVE: To ensure that all cartons currently located within the IM New Jersey warehouse contain all required data (date range, description and record class code) and that the data is entered into IM's computer system.

SCOPE: Identify all cartons that are missing, at least, one field of data information. IM will inventory cartons for any missing information, and RIM will provide record class codes where needed.

PROCESS:

1. Lisa will review the Inventory Report from IM New Jersey. Lisa will note cartons that need date range, description or both. Lisa will also note cartons where clarification on description is needed and make changes to record class codes as appropriate.
2. Lisa will forward Estimate Form, Inventory Report, and Project Requirements and Expectations to Phil Hasselvander so that he can make a copy of the package and then mail the original via overnight to Deborah Wood for response. Phil will also include a copy of the new Inventory Form in the package being sent to Deborah. Phil will keep a complete copy of the package within the department.
3. When the completed Estimate Request Form has been returned by IM, Phil is to seek approval of IM's estimate from Brenda Tate, and get her signature. Once signed, Phil will copy and send original to IM so that the inventory project can start.
4. Once the inventory project has begun, Phil will keep up on the status of the project through IM's weekly project status reports, and forward a copy to the other RIM members.
5. As faxed inventory forms are received, from cartons that have been inventoried, Phil will review the data information supplied, research and enter the record class codes, approve the inventory form and fax the form back to IM within 72 hours. Applying record class codes for the inventory project will take priority over regular day-to-day activities.
6. If there are problems with descriptions where Phil cannot give a record class code due to an incomplete description, Phil will contact the IM Project Supervisor immediately after reviewing the inventory forms. Phil will request that the carton be re-inventoried or have someone come to the phone with the carton in-hand and describe the carton contents. If Phil cannot figure out the contents of the carton, he should either connect Lisa into the call with IM, or request that the carton be permanently withdrawn and shipped to him.
7. If the carton is shipped to Phil due to problems with obtaining a description, Phil will review the contents once they are received. If the records have a retention

Records Management Program – Policies & Procedures

requirement, Phil will complete an inventory form for the carton, and have it stored in the D.C. area.

8. If cartons are identified as junk, supplies or other non-record type cartons, IM will inform Phil. The cartons will be shipped to Phil for disposition within MCI.
9. If problems continue regarding inadequate data information on the inventory forms, Phil will speak with Lisa regarding the problems. Phil and Lisa will contact the IM Project Supervisor and Deborah Wood regarding the issues.
10. Once the inventory phase of the project is complete and an inventory report is received, Phil and Lisa will review the report to ensure completion of the project.
11. Phil will also ensure that all data changes as marked on the inventory reports sent to Iron Mountain at the beginning of the project were made.
12. Once it has been determined by MCI that the project is complete, Phil will contact IM, in writing, informing them that we have determined that the project has been completed.
13. If problems occur during the inventory project, Phil will document all problems, in detail and in writing, to the Project Supervisor, Deborah Wood and Lisa regarding these problems.

APPENDIX H

Destruction Review Spreadsheet

Destruction Review Memo

Appendix I

IRS Rev. Proc. 97-22 and IRS Rev. Proc. 98-25

URLs:

Rev. Proc. 98-25 at: <http://ftp.fedworld.gov/pub/irs-irbs/irb98-11.pdf>. This is the IRS bulletin and it can be found on starting on page 7 through page 12.

Rev. Proc. 97-22: <http://ftp.fedworld.gov/pub/irs-irbs/irb97-13.pdf> - starting on Page 9 through page 11.

These bulletins load in Adobe.

APPENDIX J

Listing of HR Records being imaged

LPP Approval Memo

Records Management Program – Policies & Procedures
HR RECORDS AND IMAGING

MCI images the following personnel and benefit records at the Human Resources office in Denver.

Agreement Records:

Data Security	Employee Reimbursement
Tuition Reimbursement	New Products, Ideas, etc.
Overpayment/Repayment	Confidentiality
Secrecy of Communications	Commissions Financial Forms
Relocation	

I-9 Records:

Application for SSN	Personal Data
I-9 Form	Employee Verification

Job-Related Records:

PAF/Salary Matrix	Transfer
Reclass	Adjustments
Promotion	New Hire
Leave of Absence	Termination
Merit	Rehire
Attendance Records	Warnings

Benefits Records:

Insurance	Medical Waiver
PIN Authorization	Benefits Enrollment
401K	Emergency Contacts
GULP	Dental
Benefits Status Change	HMO/Org Change Form
ESPP	Beneficiary Forms

Reviews/Performance Records**Payroll-related Records:**

Direct Deposit	Deduction Worksheet
Tax Forms	United Way Authorization

Other Records:

Address Change	Application
Offer Letter	Letter of Commendation
Resume	Monitoring Forms

® Records Management has received approval from LPP to retain the above records on one imaging system (see Exhibit 13).

APPENDIX K

Guide for New Acquisitions

Memo

Questionnaire



Records and Information Management

A Guide for New Acquisitions

Records Compliance Program

Welcome Aboard.

A Records & Information Management (RIM) Program is vital to MCI. As such, a records retention policy and program, as well as a formal Record Retention Schedule have been developed for company-wide use to minimize MCI's legal and financial risks. Each MCI employee is responsible for understanding the policy and complying with this *mandatory* program.

The definition of a record is any and all recorded information regardless of medium or specific characteristics, that is created, received, used or distributed by MCI in the course of business. This includes – but is not limited to: paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

On top of everything else you will be doing to integrate your business within MCI, Records & Information Management (RIM) needs some information in order to ensure that there is a smooth transition of your records into MCI.

- A contact name and number of an individual that can assist in accessing all of your company's records.
- A list of all your business locations with full addresses and phone numbers. The list should also contain what record types are located in each location, in what media form, and whether that location is using off-site storage.
- If off-site storage is being used, please provide the name, location, account number, contact name and phone number of the off-site storage vendor; also, a copy of the contract, price listing and inventory report. This includes all storage locations; records management/storage companies, internal storage locations and self-storage facilities.
- A copy of your company's record retention program and procedures or something in writing indicating your company's records management.

Records Management Program – Policies & Procedures

While your records program is being evaluated by RIM, absolutely no records destruction of any kind can take place. While going through the transition, if you find that you are in need of offsite storage, please contact RIM.

Employees should be informed that any company records that are being used or retained in their homes, garages, cars, etc. must be returned to the office.

Until you are able to access MCI's intranet, attached you will find an overview of our records program and procedures, also the Records Retention Schedule (RRS) in PDF format. If you cannot access the PDF file contact RIM and a copy will be sent via first-class mail. Once you can access the company's intranet, you can become fully indoctrinated in to our Program via RIM's website at:
<https://teamnet2.mcilink.com/departments/rim/>.

If you have any questions or concerns, please contact:

James Green, 703-886-3364, James.Green@mci.com

Joe Stephens, 703-886-3401, Joe.W.Stephens@mci.com

Phil Hasselvander, 703-886-3398, Philip.H.Hasselvander@mci.com

Darrell Daniels, 703-886-3378, Darrell.Daniels@mci.com

Christopher Moses, 703-886-7117, Christopher.Moses@mci.com

Michael Simms, 703-886-1252, Michael.L.Simms@mci.com

Charles McBride, 703-886-3831, Charles.Mcbride@mci.com

Brenda Tate, Sr. Manager of Audit & Control, 703-886-3538, Brenda.Tate@mci.com

Joyce Moultry, Manager, Records & Information Management, 703-886-3336,

Joyce.Moultry@mci.com

Π Throughout the attached guideline numerous references are made to the RIM website. If you do not have access to this website yet, and have need for offsite storage, please contact RIM and we will assist in providing services with the appropriate storage vendor.

Records Management Program – Policies & Procedures

TABLE OF CONTENTS

RECORDS MANAGEMENT PROGRAM OVERVIEW	4
GUIDELINES	
Adherence to the Records Program	5
What is a Record?	5
Vital Records	5
The Records Retention Schedule (RRS)	5
Record Series	6
Locate the Records Series number associated with your record	7
Locate a Record Series number using the website	7
Destruction Review Date	7
Off-Site Storage	7
Storage vendors and services	8
Handling instructions for paper, microform, electronic records	8
Storage Procedures, Pick-up / Delivery Schedule	9
New Storage	10
Inventory Form	10
Retrievals from off-site storage	11
Refiles	11
Outcarded Records	11
Compliance Audits	12
E-Mail	12
Imaging	13